

FILED 11/19/24 11:46 AM DCTRP

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF Marion

Terry IEE Collins JR

Plaintiff,

vs.

Marion County Jail

Defendant(s).

Case No. 6:24-cv-1933-CL

**PETITION FOR WRIT OF
HABEAS CORPUS**

Article I §23 Oregon Constitution
ORS 34.310, et seq.

1.

Plaintiff is Terry IEE Collins JR who is detained and restrained of liberty at the Marion County Jail located in Salem, Oregon, by virtue of a judgment of conviction rendered in the matter of the State of Oregon vs. Terry

IEE Collins JR, Marion County, Case Number 24cr1904

2.

Defendant is Marion County, Superintendent of Marion County Jail, represented in this proceeding by and through Ellen Rosenblum, Attorney General for the State of Oregon, or his designated assistant.

3.

Plaintiff alleges Defendant retains a true copy of his/her judgment of conviction within the Department of Corrections' business records and aforesaid document was unavailable to annex hereto at the time of the filing of this petition.

4.

The legality of the imprisonment, incarceration, or restraint has not been adjudicated upon PAGE

5.

The detention, imprisonment or restraint on Plaintiff was and is illegal and the illegality thereof includes the following particulars:

Ground one: CRS 34.310

Facts: CRS 34.310: Threatening my Life/Promise to make my time harder I haven't received proper Medical Care to my Shotgun Wound in My leg for 2 months because Marion County Jail refuse to send another Transport Co. with the Transporter who threatened me from the Jail & refused to reschedule my appointment from start.

Ground two: CRUEL & USUAL Punishment

Facts: Marion County Jail have me walking everyday on my leg with a open Shotgun Wound knowing the stress from my leg when walking causes me extreme pain in my Ankle, heel and toes Due to cleft toe, the Medical team can easily come to Jail for treatment.

Ground three: Marion County Jail Same deputy Threatened my life 7 years ago, which resulted in my transfer from Marion County - Jail to Okemos County Jail for my safety. Now presently the same Co. is the transport officer/medical Officer working in the -

Facts: Nurses Unit is living up to his recurrently Statement stated above "Promises to make my time harder here at Marion County Jail" is making my receiving care difficult.

6.

Plaintiff has no other plain, speedy or adequate remedy at law. Appeal is not an adequate or available remedy at law because all the other remedies and remedy pointed me in this direction.

7.

The imprisonment, detention or restraint on Plaintiff is illegal and requires immediate court intervention to prevent further deprivation of constitutional and other legal rights.

WHEREFORE, Plaintiff asks this Court for a Writ of Habeas Corpus issued under seal of this Court directing Defendant to appear with Plaintiff at a time and place specified by the Court to be dealt with according to law.

Terry Lee Collins JR
(Signature)

TERRY LEE COLLINS JR
(Print Name)

SID # 20678515

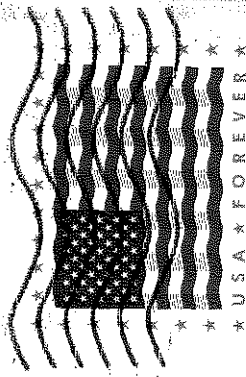
46000 Ashburnville Hwy SE Salem, OR 97317
(address)

Subscribed and sworn to before me on this 11-13-24 day of November, 2024
in Marion County of the State of Oregon.

Notary Public for Oregon
My Commission Expires: _____

Name: JERRY COLLINS JR.
SID# 20678515
LEGAL/OFFICIAL MAIL ONLY
Marion County Sheriff's Office-Jail
4000 Aurnsville Hwy SE
Salem, OR 97317

PORTLAND OR RPDC 972
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